

EXHIBIT B

PARKER | DANIELS | KIBORT

May 5, 2023

VIA E-MAIL

Michael Bloom
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Re: *Smartmatic USA Corp. et al. v. Lindell et al.*
Case No. 22-cv-98 (WMW/JFD) (D. Minn.).

Counsel:

I am writing to follow up on my letter dated April 26, 2023, that identified a series of deficiencies in Smartmatic's discovery responses. That letter requested a response by May 3, 2023. To date we have not received a response of any kind.

Be advised that this afternoon we will be seeking the earliest possible hearing date with the Court for a Motion to Compel proper responses.

Sincerely,

/s/ *Matthew R. Eslick*

Matthew R. Eslick

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